

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No. 1:21-cv-11558-LTS

**AMERICAN AIRLINES GROUP INC. AND JETBLUE AIRWAYS CORPORATION’S  
UNOPPOSED MOTION TO SEAL CONFIDENTIAL INFORMATION  
IN THEIR MEMORANDUM IN SUPPORT OF THEIR MOTION TO COMPEL  
ATTENDANCE OF DELTA EXECUTIVES AT TRIAL**

Defendants American Airlines Group Inc. and JetBlue Airways Corporation (collectively, “Defendants”), respectfully move the Court under Local Rule 7.2 and the Stipulated Protective Order (Dkt. No. 99) for an order placing under seal limited portions of their Memorandum in Support of their Motion to Compel Attendance of Delta Executives at Trial (“Memorandum”). Pursuant to Local Rule 7.2, Defendants further request that the sealed portions of the Memorandum remain impounded until further order of the Court.

The Memorandum contains information that third party Delta Air Lines, Inc. (“Delta”) has designated as Confidential or Highly Confidential under the terms of the Stipulated Protected Order entered in this case. ECF No. 99. The Stipulated Protected Order requires Defendants to seal any such information that a third party has designated as Confidential or Highly Confidential when it is filed on the public docket. *See id.* ¶ 17.

Defendants' request for sealing is narrowly tailored. Defendants seek only to seal the excerpts from the Memorandum that discuss and reference Delta's confidential information. This ensures that Delta's information will remain confidential and protects Delta's commercial interests while permitting the public to have the fullest possible access to the Memorandum.

Accordingly, and pursuant to the Stipulated Protective Order, Defendants respectfully request that the Court seal limited portions of Defendants' Memorandum to protect this information designated as Confidential or Highly Confidential by Delta. Defendants are concurrently filing a redacted version of their Memorandum on the public docket, where only the confidential material has been removed.

Defendants have met and conferred with Plaintiffs as required by Local Rule 7.1, and Plaintiffs do not oppose this motion.

Dated: September 13, 2022

Respectfully submitted,

/s/ Daniel M. Wall

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1, Defendants have conferred with Plaintiffs regarding the relief requested in this motion, and Plaintiffs do not oppose this motion.

/s/ Daniel M. Wall  
Daniel M. Wall

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing. In addition, I hereby certify that a copy of the foregoing document was served by email upon Michael Mitchell of Boies Schiller Flexner LLP, counsel to Delta Air Lines, Inc.

/s/ Daniel M. Wall  
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